

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Pennsylvania

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)One 2007 maroon Nissan Altima sedan, PA tag # JXL-3000,  
currently in the possession of the FBICase No. ~~17-1359-M~~

17-1385-M-1

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

evidence, contraband, fruits, instrumentalities of a crime, further described in attachment B to the affidavit

located in the Eastern District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

one 2007 maroon Nissan Altima sedan, PA tag # JXL-3000, further described in attachment A to the affidavit

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. 1591, 1594(a)

Offense Description

sex trafficking of a minor and attempt

The application is based on these facts:

See attached affidavit

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

FBI SA Jennifer Batish

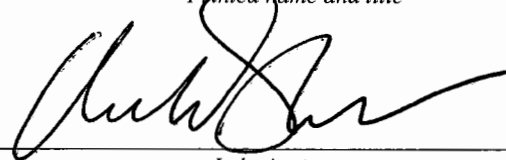
Printed name and title

Sworn to before me and signed in my presence.

Date:

10/16/2017

City and state: Philadelphia, PA



Judge's signature

Hon. Richard A. Lloret, U.S. Magistrate Judge

Printed name and title

## UNITED STATES DISTRICT COURT

for the  
Eastern District of Pennsylvania

## In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

One Apple iPhone model A1549, IMEI 359296067708215,  
currently in the possession of the FBI

Case No. 17-1359-M

17-1385-M-2

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

evidence, contraband, fruits, instrumentalities of a crime, further described in attachment D to the affidavit

located in the Eastern District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

one Apple iPhone model A1549, IMEI 359296067708215, further described in attachment C to the affidavit

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

18 U.S.C. 1591, 1594(a)

Offense Description

sex trafficking of a minor and attempt

The application is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

FBI SA Jennifer Batish

Printed name and title

Sworn to before me and signed in my presence.

Date:

10/16/2017



Judge's signature

City and state: Philadelphia, PA

Hon. Richard A. Lloret, U.S. Magistrate Judge

Printed name and title

**UNITED STATES MAGISTRATE COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re Search of  
One Apple iPhone, model A1549,  
IMEI 359296067708215,  
and  
One 2007 maroon Nissan Altima  
Sedan, PA tag # JXL-3000,  
both currently in the possession  
of the FBI, 600 Arch St.,  
Philadelphia, PA, 19106**

**: Mag. No. ~~17-1359-M~~**

**17-1385-M**

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Jennifer D. Batish, a Special Agent with the Federal Bureau of Investigation (“FBI”), Philadelphia, Pennsylvania, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent (“SA”) for the FBI since December, 2008. I am presently assigned to the Philadelphia Division’s Crimes against Children Squad, which investigates sex trafficking of children and prostitution investigations, child pornography, and kidnappings, among other violations of federal law. I have gained experience through training at the FBI Academy, various conferences involving crimes against children, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. The following information was compiled by your affiant from a variety of sources to include my personal knowledge, information obtained during my participation in this investigation, review of documents, knowledge obtained from other individuals including law enforcement personnel, and communications with others who have personal knowledge of the

events and circumstances described herein. This affidavit is being submitted in support of search warrants for the following, further described in attachments A and C, currently in the custody of the FBI Philadelphia Division, to search for evidence, contraband, fruits and instrumentalities of crime, further described in attachments B and D, of violations of 18 U.S.C. § 1591, sex trafficking of minors:

a. One (1) 2007 maroon Nissan Altima Sedan, Pennsylvania tag number JXL-3000 (the “Target Vehicle”).

b. One (1) Apple iPhone Model A1549 IMEI 359296067708215 (the “Target Cell Phone”)

4. Title 18, United States Code, Section 1591, sex trafficking of a minor, makes it a crime to, in or affecting interstate or foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, or solicit by any means a person, or benefit financially or by receiving anything of value from participation in a venture which has engaged in such an act, knowing, or in reckless disregard of the fact, that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act. Title 18, United States Code, Section 1594(a), criminalizes attempted sex trafficking of a minor.

5. I have not included every fact known to me concerning this investigation, rather I have submitted only those facts and circumstances that I believe establish probable cause to support the issuance of the search warrant for these cellular phones.

#### **FACTS SUPPORTING PROBABLE CAUSE**

6. The FBI is working with a confidential informant (hereinafter known as “CI”) who posted a prostitution advertisement on Backpage.com on approximately September 27, 2017,

indicating that she was available to engage in commercial sex acts and providing a phone number for sex buyers to call. On October 4, 2017, a person identifying himself as "GAMBINO" from the New York area (hereinafter "GAMBINO") contacted CI by text message (via Target Cell Phone number), and stated, "Wassup gorgeous no disrespect but you got an intelligent gentlemen [sic] wanting to know if you thought about changing your current situation to one under certified instructions and understanding if you want to know more we can talk." CI subsequently responded, "Hi In [sic] Sunshine I got a text from you. And no disrespect taking by your message to tell me more what your name in what city are you and how would I be benefitting from being under your certified instruction." GAMBINO replied, "Well how you doing love I'm GAMBINO I'm Currently in New York Rite Now I'm A Man of Business An Respect Definitely Hitting For Bands You will benefit for Me Because I know the Game I will show you how to get to it the right way long as you loyal An ready to stay down for this come up let me cause it's definitely worth it when somebody know the game." I know from my training and experience working child sex trafficking investigations that GAMBINO was referring to "the Game," which means prostitution, claiming to be a pimp, and attempting to recruit CI to work for him as a prostitute after seeing her escort advertisement on Backpage.com.

7. After advising GAMBINO that she was located in the Philadelphia area, the following text conversation occurred, in which CI asked what GAMBINO could offer her, and indicated that she was 16 years old:

CI: Ok cool so what make you better then [sic] the rest of these so called daddy's out here I heard all before

GAMBINO: I'm loyal An I'm respectful An I stand on my word I live by the Game.

CI: So what is it that you can offer me [or] provide that I alright don't have.

GAMBINO: I don't know your situation but I'm stable sweetheart [sic] car everything.



CI : Ok well what do you provide for a place to stay do you provide dates my clothing or I'm supplies I need like condoms wiped etc and where will I be working at.

GAMBINO: I take care of everything Babygirl [sic]. You will be working in & outcalls. I mobile so I to move around you will be staying with me.

CI: Oh OK so would you like to know how old I'm before I give my phone number to call me.

GAMBINO: Definitely. How old are you An how come I can't keep a pic.

CI: I'm 16 I'm a run away I'm not from here I'm from Raleigh nc u been meeting girls n working w them for past fees months. I don't like sending pic because of my age I'm not trying to be found or how you not gonna use them.

GAMBINO: Sweetheart I'm not a cop or somebody that's looking for I you I just like to know who I'm talking to I sent you my pic so you know I'm not on no bullshit.

During the text conversations, GAMBINO sent an image of a black male with a moustache and beard who was wearing a red hat. The male was depicted making the universal "I love you" sign with his right hand. I know based on my training and experience that the term "daddy" is used to mean a pimp or trafficker, and the terms "in & outcalls" refer to commercial sex acts conducted either on location at a hotel or residence ("incall") or at the sex buyer's location ("outcall").

8. Later in the text conversation, CI asked, "Does my age bother you at all."

GAMBINO responded, "It so but I know how to move. So not really."

9. On the evening of October 4, 2017, CI conducted a consensually recorded telephone conversation with GAMBINO, in which he explained to CI how he would provide for her as her pimp. The following are partial excerpts of that conversation:

CI: How would this work? Like, would you come here and get me or?

GAMBINO: Yea. I told you I'm mobile. I have a car.

CI: I just gotta make sure that I'm not getting myself in a situation like I was before where, you know, person told me they had me, they'd take care of everything room and board, like...

GAMBINO: Yea

CI: Is there a fee, or do we keep everything, like how does, I don't even know myself what I'm getting...

GAMBINO: What?

CI: I need know for myself, like, what am I getting myself into. Are you get a fee, do you get everything, like what am I getting into...

GAMBINO: Basically you get yourself next to me, I mean like, I'm a take care of everything that you need to be taken care of [UI] you will be well taken care of

CI: Well taken care of?

GAMBINO: Well taken care of. What I mean by well taken care of any and everything you need is gonna be taken care of

CI: Place to stay, [UI] dates...

GAMBINO Place to stay, food, clothes, tellies, all that, everything, everything basically, basically everything that comes with the game.

CI: Ok. So like, you provide the dates, or?

GAMBINO: Yeah. I post you, and all that.

CI: Ok. And you buy all my supplies and everything?

GAMBINO: Everything. Everything. All you gotta to is, all you gotta do, all you gotta do is just work. Everything else is, everything else is gonna be taken care of, finances...

CI: Is it just me, or is it like, other girls, that, that where I'll be with, or

GAMBINO: Yeah, it, its, it will be you and somebody else, but, I don't, like, some females, they don't like to be around other people, so I don't know how your people skills is...

The telephone conversation continued, and GAMBINO indicated that he wanted to travel to Philadelphia to pick up CI on Monday, October 9, 2017, at which time she would start working for him as a prostitute.

10. On October 5, 2017, the following text conversation occurred, in which GAMBINO indicated that he was ready to come to Philadelphia to get CI:

GAMBINO: What's wrong

CI: My day is not going right

GAMBINO: Damn I'm waiting on you so we can make that move

CI: I know well remember I told this girl been helping me out right

GAMBINO: Yes talk to me

CI: I'm still good with having a room but acting funny today about posting me up I guess my phone rings more then her's lol any its stressing out cause I'm trying to make that fee for you so when I see you Monday or Tuesday my money right and male you a happy man. I need get posted asap.

GAMBINO: I understand Babygirl if you want me to come An get you let me know. I got to get coins.

CI: ...if you can post me up know that would be great I'm a rider I like have my money right.

GAMBINO: How much you made so far. I'm post you. Yea you ad not up.

CI: Yeah u think she took it down

GAMBINO: I'm looking now...

Later, the conversation continued as follows:

GAMBINO: I think it's time you change your situation if she moving like that. I'm get coins I need more I only got 4 dollars left in coins.

CI: OK thank you so much just let me know when you to post me.

11. On the same date, GAMBINO indicated via text that he was ready to pick up the CI. He further stated, "I'm just ready to speed the process up" and "I'm telling you let me come get you." GAMBINO also stated, "Fuck all that wait to Monday shit ma lets get this ball rolling" and "Make daddy proud." CI responded by stating, "I understand you wanna start now so call me tomorrow around 11 am right now I'm getting ready to do an overnight call."

12. On October 6, 2017, GAMBINO stated he was en route from New York to pick up CI at the Motel 6, for which she provided him an address of 11580 Roosevelt Boulevard, Philadelphia, PA. GAMBINO also told the CI that he would be arriving in a Nissan Altima. Several hours passed and CI asked GAMBINO what time he was going to arrive. GAMBINO



asked CI, “you on some bullshit” and stated, “You playing games.” GAMBINO then called several times angry on the phone, saying he was coming and that she “pissed him off” because she wasn’t giving him time to get there. GAMBINO stated that based on her age, he doesn’t have time for “fuckery” and that he’s being cautious of how to move with her and she knows the risk that comes with being with him and her age. GAMBINO stated he was 26 years old and that he had her by 20 years. CI then told GAMBINO she was going to “chill out” and that she was “out.”

13. Throughout the holiday weekend of October 7-9, 2017, GAMBINO proceeded to text CI and ask how much money CI was making and how her “fee” was coming along. He also repeatedly indicated that he was ready to come and get her. On October 9, 2017, GAMBINO called CI and arranged to meet her the following day.

14. On Tuesday, October 10, 2017, CI gave GAMBINO the address of Four Points Sheraton hotel located 9461 Roosevelt Boulevard, Philadelphia, PA 19114, via text message. GAMBINO proceeded to send via text message a screenshot of a navigation application called Waze that indicated he was traveling at 46 miles per hour, and would get to the hotel in 1 hour and 36 minutes.

15. On October 10, 2017, GAMBINO, identified as MALIK PALIN, DOB 6/18/1991, arrived at the Four Points Sheraton in the Target Vehicle. PALIN was speaking to CI on the Target Cell Phone while walking into the hotel. PALIN arrived at room number 119, to which CI had told him to come, and was subsequently arrested. PALIN appeared to be the same person as the photo purportedly of himself that he had previously sent to the CI via text message. At the time of the arrest, FBI SA Michael Bronisz called phone number 347-479-2163, which was the phone number the CI was using to communicate with GAMBINO via text message, in the presence of PALIN and the Target Cell Phone started ringing.

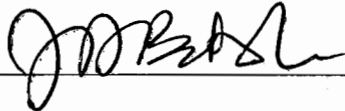
16. Based on my training and experience, sex traffickers often use their phones to post advertisements on prostitution related websites, to take photos of girls to put on websites, to communicate with customers, and to recruit other girls to work for them as prostitutes. The Target Cell Phone was utilized by PALIN to attempt to recruit a purported minor female and communicated with this purported minor female via both telephone calls and text messages. In addition, the CI asked how long PALIN had been “around the game”, (based on my training and experience the game means the pimp/prostitution business), and PALIN told the CI that he has been involved over eight years. A review of the text messages, email addresses, websites visited, and other applications may have information about other women and underage girls that were trafficked by PALIN.

17. PALIN indicated to the CI in text and via telephone on multiple occasions that he is “mobile,” so that he could take her anywhere she needed to go to prostitute. On October 10, 2017, during a post-Miranda interview of PALIN, he further stated that the Target Vehicle was his car and that he bought it recently. Based on my training and experience, sex traffickers often live out of hotels and vehicles. They often travel in these vehicles from hotel to hotel or state to state profiting from the individuals working for them. Often vehicles contain all of the belongings of the pimp and the individuals that are working for them. This property often includes cellular phones, pre-paid credit cards used to post prostitution advertisements, identifying documents of the individuals being trafficked, and other items that are used in furtherance of the pimp’s prostitution operation.

#### **D. CONCLUSION**

18. Based upon the information above, I respectfully submit that there is probable cause to believe that evidence of violations of Title 18 United States Code § 1591, further

described in Attachment B and D, will be found in the Target Vehicle and on the Target Cell Phone, further described in Attachments A and C. Therefore, I respectfully request that the attached warrants be issued authorizing the search and seizure of these items.

A handwritten signature in black ink, appearing to read 'J. Batish', written over a horizontal line.

Jennifer D. Batish

Special Agent

Federal Bureau of Investigation

Sworn to and subscribed before me

this 16<sup>th</sup> day of October, 2017:

A handwritten signature in black ink, appearing to read 'Richard A. Lloret', written over a horizontal line.

HONORABLE RICHARD A. LLORET

UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A – TARGET VEHICLE**

Location to be searched:

2007 Nissan Altima Sedan, Pennsylvania Tag #JXL-3000

The target vehicle is a maroon in color, four-door Nissan Altima sedan, with Pennsylvania tag # JXL-3000. The Vehicle Identification Number (VIN) registered with the state of Pennsylvania is listed as 1N4AL21E37N447927. The vehicle is currently in the possession of the Federal Bureau of Investigation, 600 Arch Street, Philadelphia, PA, 19106.

**ATTACHMENT B – TARGET VEHICLE**

**ITEMS TO BE SEARCHED FOR AND SEIZED**

1. All visual depictions of individuals engaged in sexually explicit conduct, on whatever medium (e.g. digital media, optical media), including but not limited to computers, cellular phones, smart phones, tablets, hard drives, cameras, CD's, DVD's, SIM cards and flash memory cards. These include both originals and copies;
2. All documents in electronic form, including correspondence, records, opened or unopened e-mails, text messages, chat logs, and Internet history, pertaining to sex trafficking, as defined in Title 18, United States Code, Section 1591;
3. All communications with individuals involving sexual topics or in an effort to seduce or entice the minor to engage in commercial sexual acts for a prostitution operation;
4. All computer passwords, keywords and other data security devices designed to restrict access to or hide computer software, documentation or data. Data security devices may consist of hardware, software, or other programming code. Any password or encryption key that may control access to a computer operating system, individual computer files, or other electronic data;
5. Evidence and contents of logs and files on any computer or electronic storage device, such as those generated by the computer's operating system, which describes the history and use of the device, including but not limited to files indicating when files were written, were opened, were saved, or were deleted; evidence tending to show the identity of the person using the computer at the time any visual depictions described in paragraph 1 were created, sent, received, or viewed; and, any malware resident on the computer or electronic storage device;
6. United States currency that may constitute the proceeds of prostitution activity; and other records documenting, or items reflecting, an enterprise organized to promote prostitution;
7. Safes and the contents thereof, including but not limited to money earned from prostitution;
8. Records of proceeds earned from prostitution;
9. Any items which to show an active participation in an illicit sex business such as: contraceptives, condoms, clothing, lingerie, lubricating oils, sex toys, video tapes/discs, pay-owe sheets, laundry receipts, toiletries, hygiene products and tally sheets;
10. Records, documents, and materials used to facilitate communications, and other tangible items evidencing the promotion of prostitution, including financial records, receipts for payment and disbursement of services, medical records, cellular telephone contracts and bills, business cards and lists of names and telephone numbers.



11. Indicia of occupancy, residency, rental and/or ownership of the premises described herein, including rental, purchase or lease agreements, registration documents, and keys;

12. Any notes, documents, records, or correspondence, in any format or medium concerning communications between individuals about prostitution or sex trafficking, and records relating to internet sites that contain images of prostitution or that cater to those with an interest in child prostitution;

13. Any notes, documents, records, or correspondence, in any format or medium concerning membership in online groups, clubs, postings, or services that provide or make accessible individuals for prostitution;

14. Any records, documents, invoices and materials, in any format or medium that concern information regarding accounts with an Internet Service Provider that may be used in the prostitution business or records concerning communications between individuals about prostitution or the existence of sites on the Internet that pertain to prostitution;

15. Any address books, mailing lists, supplier lists, mailing address labels, and documents and records, in any format or medium that may be used for prostitution services;

16. Any banking and financial records, including money orders or bank statements which may reflect transactions involving prostitution;

17. Any credit cards, debit cards, gift cards and/or prepaid cards which may be related to transactions involving prostitution;

18. Any cameras, film, videotapes or other photographic equipment that may be, or are used to advertise prostitution services;

19. Any diaries, notebooks, notes, or ledgers reflecting contact with or activities involving minors engaged in prostitution or sexually explicit conduct.

20. Any firearms and any other weapons which may be used to facilitate the coercion of individuals to engage in prostitution;

21. Any and all vehicle toll records, receipts, and devices, including but not limited to EZ-Pass records, receipts, devices, or subscriber information.

**ATTACHMENT C – TARGET CELL PHONE**

Item to be searched:

1. One (1) Apple iPhone Model A1549 IMEI 359296067708215; currently in the possession of the Federal Bureau of Investigation, 600 Arch Street, Philadelphia, PA, 19106.

**ATTACHMENT D – TARGET CELL PHONE**  
**ITEMS TO BE SEARCHED FOR AND SEIZED**

1. The cellular telephone numbers and/or direct connect and/or names and identities, including electronic mail addresses, usernames and passwords assigned to the device;
2. Digital, cellular, and/or telephone numbers and/or direct connect numbers, names and identities, including electronic mail addresses, usernames and passwords stored in the device and in any other electronic media attached to or found with the device, including but not limited to SIM cards and flash memory cards;
3. Text messages, telephone call history, contact lists, electronic mail messages, saved prostitution advertisements, saved web pages, Internet bookmarks, Internet favorites, Internet history, global positioning system data, and any other documents or information stored in the device's memory, to include phone applications, relating to prostitution;
4. All sexually suggestive visual depictions of individuals produced on any medium (e.g. digital media, optical media), including but not limited to SIM cards and flash memory cards, also including those in opened or unopened e-mails or text messages. These include both originals and copies;
5. All passwords, keywords and other data security devices designed to restrict access to or hide software, documentation or data. Data security devices may consist of hardware, software, or other programming code. Any password or encryption key that may control access to the device's operating system, individual files, or other electronic data;
6. Evidence and contents of logs and files on a computer or storage device, such as those generated by the computer's operating system, which describes the history and use of the device, including but not limited to files indicating when files were written, were opened, were saved, or were deleted. Evidence tending to show the identity of the person using the phone at the time any of the items listed above were created, sent, received, or viewed. Also, any malware resident on the phone.